

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

**IN RE: AME CHURCH EMPLOYEE
RETIREMENT FUND LITIGATION**

MDL Docket No. 1:22-md-03035-STA-jay
ALL CASES

Honorable S. Thomas Anderson

**SYMETRA LIFE INSURANCE COMPANY AND AMEC’S JOINT
STATUS UPDATE ON THE AAA ARBITRATION**

Pursuant to this Court’s Order of December 11, 2023 (ECF No. 316), Symetra Life Insurance Company (“Symetra”) and the African Methodist Episcopal Church (“AMEC”) provide the following joint status report on the ongoing AAA arbitration between them.

Symetra and AMEC held an initial hearing with the arbitrator on November 29, 2023, after which the arbitrator set a schedule for written discovery and initial briefing on the issue of the scope of the arbitration. In accordance with that schedule, Symetra and AMEC served written discovery requests on each other on February 28, 2024, and responded to those requests on April 5, 2024. Symetra and AMEC agreed that for the sake of efficiency they would both produce in the arbitration all responsive documents that were produced in this MDL proceeding.

Symetra and AMEC submitted position statements on the scope of the arbitration on March 15, 2024, and their responses to those statements on March 25, 2024. The arbitrator held a second hearing on April 12, 2024, during which the arbitrator heard argument on the parties’ dispute over arbitrability and the scope of the arbitration. The arbitrator issued Scheduling Order #2, which

sets deadlines and a schedule for resolving the scope of the arbitration. Per the arbitrator's order, Scheduling Order #2 is attached as **Exhibit 1** to this status update.¹

A hearing on the scope of the arbitration is currently set for July 16, 2024.

Dated: June 18, 2024

Respectfully submitted,

/s/ Benjamin Stoll

Markham R. Leventhal

mleventhal@carltonfields.com

Benjamin M. Stoll

bstoll@carltonfields.com

Nathaniel G. Foell

nfoell@carltonfields.com

CARLTON FIELDS, P.A.

1025 Thomas Jefferson St. NW #400W

Washington, DC 20007

Telephone: (202) 965-8189

Attorneys for Defendant

Symetra Life Insurance Company

/s/ Bruce A. McMullen

Bruce A. McMullen

bmcullen@bakerdonelson.com

Mary Wu Tullis

mtullis@bakerdonelson.com

Jennie V. Silk

jsilk@bakerdonelson.com

BAKER, DONELSON, BEARMAN

CALDWELL & BERKOWITZ, P.C.

165 Madison Avenue, Suite 2000

Memphis, TN 38103

Telephone: (901) 526-2000

¹ On June 17, 2024, the Arbitrator granted a modest extension to certain deadlines in Scheduling Order #2. The modified deadline for exchanging the parties' initial respective lists of undisputed material facts with respect to the jurisdictional issues is June 19, 2024. The modified deadline for exchanging responses to those lists of facts is July 2, 2024. The modified deadline for the parties to submit lists of agreed undisputed material facts and disputed material facts to the Arbitrator is July 10, 2024.

*Attorneys for AMEC and AMEC Ministerial
Retirement Annuity Plan*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of June 2024, a true and correct copy of the foregoing document was sent to all counsel of record via the CM/ECF system.

/s/ Benjamin Stoll